## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: BROOKE EDITH BAILEY : BK NO. 17-16552 MDC

dba BRAAAP SAVAGE LLC,

FKA BROOKE EDITH COHEE : CHAPTER 13

FIFTH THIRD BANK :

SECURED CREDITOR

VS.

BROOKE EDITH BAILEY :

dba BRAAAP SAVAGE LLC, FKA BROOKE EDITH COHEE

APPLICANT :

## PRACEIPE TO WITHDRAW DEBTOR'S OBJECTION TO CREDITOR'S PROOF OF CLAIM

Kindly withdraw the Objection to Creditor's Proof of Claim that was filed on December 6, 2017, on behalf of Debtor Brooke Edith Bailey, dba Braaap Savage LLC, fka Brooke Edith Cohee at Docket number 30.

**AVALLONE LAW ASSOCIATES** 

January 19, 2018 /s/Lindsay N. Bennett

Lindsay N. Bennett, Esquire

Attorney for Debtor

215 S. Broad Street, Fifth Floor Philadelphia, PA 19107-5318

(215) 735-5525

Attorney ID No. 322793

Email: lbennett@avallonelaw.com

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## CERTIFICATION OF SERVICE DEBTOR'S PRAECIPE TO WITHDRAW DEBTOR'S OBJECTION

I, Lindsay N. Bennett, Attorney for Debtor, hereby certify that on the date indicated below, I served by first class mail or electronic means a copy of the accompanying Debtor's Praceipe to Withdraw Objection To Proof Of Claim 3 Filed By Fifth Third Bank upon the following:

Office of the United States Trustee 833 Chestnut Street, Suite 500 Philadelphia, PA 19107

Brooke Edith Bailey 75 W. Hillcrest Avenue Havertown, PA 19083 Rebecca A. Solarz, Esquire KML Law Group, P.C. BNY Mellon Independence Center 701 Market Street, Suite 5000 Philadelphia, PA 19106

William C. Miller, Esquire Standing Chapter 13 Trustee 1234 Market Street, Suite 1813 Philadelphia, PA 19107

AVALLONE LAW ASSOCIATES

January 19, 2018

/s/Lindsay N. Bennett Lindsay N. Bennett, Esquire Attorney for Debtor 215 S. Broad Street, Fifth Floor Philadelphia, PA 19107-5318 (215) 735-5525

Attorney ID No. 322793

Email: lbennett@avallonelaw.com